



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

August 1, 2025

BY ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
40 Foley Square
New York, NY 10007

Re: *National Job Corps Association et al. v. Dept. of Labor et al.*, No. 25 Civ. 04641 (ALC)

Dear Judge Carter:

This Office represents defendants, the U.S. Department of Labor and Lori Chavez-DeRemer, in her official capacity as Secretary of Labor. We write to request a one-week extension of time—from today to August 8, 2025—for the parties to propose a schedule for further litigation in this case. As the Court is aware, there is a related case in the U.S. District Court for the District of Columbia, in which the proposed case management plan is due on August 8, *see* Minute Order, *Cabrera v. U.S. Dep't of Labor*, No. 25-cv-1909 (D.D.C. July 25, 2025), and the agency wishes to coordinate the schedules of the two cases to the extent possible, which may both, for example, require the agency to prepare and file the administrative record.

Plaintiffs consent to this request.

I thank the Court for its attention to these matters.

Respectfully,

JAY CLAYTON
United States Attorney

By: /s/ Jean-David Barnea
JEAN DAVID BARNEA
DOMINIKA TARCZYNSKA
Assistant United States Attorneys
86 Chambers Street, Third Floor
New York, NY 10007
Tel: (212) 637-2679/2748
jean-david.barnea@usdoj.gov
dominika.tarczynska@usdoj.gov

Cc: Plaintiffs' counsel (by ECF)